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14 **Pro hac vice application forthcoming*

15 *Attorneys for Defendant*
16 *MGM Resorts International*

17
18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 KYLE SLOAN, individually and on behalf of
21 all others similarly situated,
Plaintiff,

22 v.

23 VICI PROPERTIES INC. and MGM
24 RESORTS INTERNATIONAL,
25 Defendants.

Case No. 2:23-cv-02042-ART-BW

**STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT
(FIRST REQUEST)**

Pursuant to LR IA 6-1, Plaintiff Kyle Sloan, and Defendant MGM Resorts International (“MGM”) (collectively, the “Parties”) respectfully stipulate MGM’s time to respond to the Complaint be extended from the current deadline of March 4, 2024 to and including March 11, 2024. This is the first stipulation for an extension of time to file MGM’s responsive pleading.

Good cause exists to enlarge the time for MGM to respond to the Complaint. There are currently thirteen other related actions filed against MGM pending in this District (the “Related Actions”). See *Owens v. MGM Resorts Int’l*, No. 2:23-cv-01480; *Kirwan v. MGM Resorts Int’l*, No. 2:23-cv-01481; *Zussman v. VICI Properties I LLC, et al.*, No. 2:23-cv-01537; *Lackey v. MGM Resorts Int’l*, No. 2:23-cv-01549; *Pircio v. MGM Resorts Int’l*, No. 2:23-cv-01550; *Terezo v. MGM Resorts Int’l*, No. 2:23-cv-01577; *Rundell v. MGM Resorts Int’l*, No. 2:23-cv-01698; *Bezak v. MGM Resorts Int’l*, No. 2:23-cv-01719; *Albrigo v. MGM Resorts Int’l*, No. 2:23-cv-1981; *Zari v. MGM Resorts Int’l*, No. 2:23-cv-01777; *Manson v. MGM Resorts Int’l*, No. 2:23-cv-01826; *Mejia v. MGM Resorts Int’l, et al.*, No. 2:24-cv-00081; *Righetti v. MGM Resorts Int’l*, No. 2:23-cv-2064.

On December 6 and December 20, 2023, plaintiffs’ counsel in six consolidated putative class actions brought against MGM by individuals who allege their PII was compromised as a result of a cybersecurity incident involving MGM in 2019 (the “2019 Actions”) filed Notices of Related Cases Pursuant to District of Nevada Local Rule 42.1, notifying the Court that the Related Actions are related to the 2019 Actions. *In re: MGM Resorts Int’l Data Breach Litig.*, No. 2:20-CV-00376-GMN-NJK, ECF 186, 188. Plaintiffs in those actions have opposed this effort because the 2019 Actions involved a different threat actor and different data. No order has issued on the notices filed by the plaintiffs in the 2019 Actions, and MGM has not responded to any other Complaint in the Related Actions.

While the foregoing matters are pending resolution, and to best ensure efficient management of this and the other Related Actions, there is good cause to permit additional time for the various parties to the Related Actions to meet and confer prior to the response to the Complaint in this action being due.

1 The Parties' request is made in good faith to enable the parties to finalize these-meet
2 and-confers, and to conserve judicial and party resources. Moreover, this case is in its
3 infancy, and this request will not prejudice any party.

4 **WHEREAS** the Parties respectfully request that MGM shall have until March 11,
5 2024, to answer, move, or otherwise respond to the Complaint.

6
7 Dated: February 28, 2024

Respectfully submitted,

8
9 /s/ Jeffrey S. Goldenberg

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MGM Resorts International*

IT IS SO ORDERED:



THE HONORABLE BRENDA WEKSLER
UNITED STATES MAGISTRATE UJDE

DATED: 2/28/2024